

MAY 29 1998

Mr. Stuart McArthur
S. C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403

Dear Mr. McArthur:

SUBJECT: Questions on Label Language in Notice of Registration
Raid Fogger K
EPA Registration Number 4822-452
Your Submissions Dated May 13 and July 18, 1997

The labeling for the product referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided that you make the labeling change indicated below prior to release for shipment of product bearing the amended labeling.

As indicated in comment (d) of our September 27, 1996 letter delete the statement "Use additional fogger for remote areas where free flow of mist is not assured" and add the limitation not to use in areas smaller than 5' x 5'. This language is consistent with that recently published in the February 4, 1998 rule for total release foggers. Also, update the label in accordance with other changes indicated in the FR Notice. I have included copies our Press Advisory for your information.

Submit two copies of your final printed labeling for our records. A stamped copy of the label is enclosed for your records.

Sincerely,

George T. LaRocca
Product Manager
Pesticide Branch
Registration Division

<label 4822-452 per comments on 5-1-97 EPA letter and further notifications (in italics) 5/97>

Raid Fogger K

(Outdoor) Fresh Scent

No unpleasant odor

Non-staining

Won't leave a wet, messy residue

Keeps killing for up to 2 months

Kills (more) insects (bugs) (roaches) (and) (fleas) faster

Kills (more) insects (bugs) (roaches) (and) (fleas) where they live and breed (hide)

Kills (more) (roaches) (and) (fleas) (insects) (bugs) on contact

Kills fast

Kills long

Kills (Fleas), (and) (Roaches), (and) (many) (other) (insects) (bugs) (see full list on label)

Kills with residual action

Kills: Roaches, Waterbugs, Palmetto Bugs, Fleas, Spiders, Ants, Crickets, Houseflies, Ticks, Black Carpet Beetles, Small Flying Moths, Saw-Toothed Grain Beetles, Rice Weevils, Pillbugs, Mosquitoes, Wasps, Hornets, Yellow Jackets, Gnats, Earwigs, Firebrats, Silverfish

More powerful formula

(Powerful) (Concentrated) (Super)(Power) (Fogger)

Powerful (Extra Fine) Fog (Fogging Mist)

Works in one hour

Penetrates deep(er)

Penetrates deep(er) to kill (more) (bugs) (insects) (roaches) (and) (fleas) (dead)

Penetrates deep(er) to kill (more) bugs (insects) (roaches) (and) (fleas) where they live and breed (hide)

Penetrates into cracks and crevices to kill (roaches) (and) (fleas) (bugs) (insects) where they live and breed.

Penetrates into cracks, crevices, and carpet fibers (better)

Reaches more bugs (insects) (roaches) (and) (fleas), so it kills more bugs (insects) (roaches) (and) (fleas)

Micro Mist Seeks out (fleas) (and) (roaches) (insects) (bugs)

Seeks out (hidden) bugs (insects) (roaches) (and) (fleas) (where they hide)

Seeks out (roaches) (and) (fleas) (bugs) (insects)

Raid Fogger K is specially concentrated for use against heavy bug (insect) (flea) (and) (roach) infestations

Relieves infestations

(Concentrated) for heavy (roach) (and) (flea) (bug) (insect) infestations

ACCEPTED
with COMMENTS
in EPA Letter Dated

MAY 29 1998

Uses less packaging materials...(Creates) less waste
Designed for serious (heavy) bug (insect) (flea) (and) (roach) problems
 Specially formulated
 With Cypermethrin**
 Penetrating Micro Mist With Cypermethrin**

For use in apartments, homes, attics, basements, cabins, garages, household storage areas, sheds, campers. **One 1.5 oz (2.1 oz.) can treats up to 5000 (7000) cu. ft. (625 (875) sq. ft) of unobstructed space (25' x 25' x 8') (25 x 35 x 8).** Use additional foggers for remote areas or where free flow of mist is not assured. Use only one can in rooms 12'x12' or smaller. Apply this product only as specified on this label. Re-treat as needed. **Do not use in food/feed handling establishments, restaurants or other areas where food/feed is commercially prepared or processed.**

ACTIVE INGREDIENT:

**Cypermethrin [cyano(3-phenoxyphenyl) methyl 3-(2,2-dichloroethenyl)-2,2-dimethyl cyclopropanecarboxylate]..... 1.716%

INERT INGREDIENTS:..... 98.284%

NET WT. **1.5 (2.1) oz.**

Contains _____ (brand name) (foggers) (units) **(3 Pack)**

KEEP OUT OF REACH OF CHILDREN

CAUTION: SEE ADDITIONAL PRECAUTIONARY STATEMENTS ON BACK

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Preparation and Directions for Using Container:

1) Open cabinets, cupboards, drawers, closets and doors in areas to be treated. REMOVE or cover exposed foods, dishes, utensils, food processing equipment and surfaces. REMOVE pets and birds, cover and turn off fish aquariums before spraying. Turn off air flow systems in aquariums. COVER waxed wood floors, waxed furniture and stereo or other plastic dust covers in the immediate area surrounding the fogger (newspapers may be used).

2) CLOSE outside doors and windows. SHUT OFF fans and air conditioners. Extinguish all flames and pilot lights. **Call your gas utility or management company if you need assistance.** Do not use fogger in a cabinet or under a counter or table. Use only one can in rooms 12' X 12' or smaller.

3) Place a chair, table or stand in the center of the room to be fogged. Cover with several layers of newspaper or paper towels.

- 4) Break off and remove tab on side of sprayer. Tilt sprayer AWAY from face (container sprays straight up). Press down firmly on sprayer pad until it snaps into place.
- 5) Set fogger on covered stand. Immediately leave treated area.
- 6) Keep treated area closed for at least **four** hours. Before reoccupying area, open all doors and windows and allow treated area to air for 30 minutes.

STORAGE & DISPOSAL

STORAGE: Store away from heat or open flames in an area inaccessible to children.

DISPOSAL: Do not reuse empty container. Wrap container and put in trash.

[Per PR Notice 94-2 the following Disposal statement, or a variation which does not alter its intent, may be used:

DISPOSAL: This container may be recycled in the few but growing number of communities where (steel) aerosol can recycling is available. Before offering for recycling, empty the can by using the product according to the label. (DO NOT PUNCTURE!) If recycling is not available, wrap the container and put in trash.]

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: May be harmful if swallowed or inhaled. Avoid breathing vapors. Causes moderate eye irritation. Avoid contact with skin, eyes and clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse. May cause contact sensitization following repeated contact with the skin of some individuals. Do not remain in enclosed areas during use. Keep out of treated area for **four** hours. Ventilate enclosed area for 30 minutes before reoccupying. Remove pets and birds and cover and turn off fish aquariums before spraying. All food preparation surfaces should be covered during application and thoroughly cleaned after use.

FIRST AID

If swallowed: (Call a doctor get medical attention.) -OR- (Call a physician or poison control center.) Do not induce vomiting. Do not give anything by mouth to an unconscious person. Avoid alcohol.

If in eyes: Flush with plenty of water. Call a physician if irritation persists.

If on skin: Wash with plenty of soap and water. Rinse thoroughly. If irritation persists or if sensitization reactions develop, contact a physician.

PHYSICAL OR CHEMICAL HAZARDS

Flammable. Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130° F. may cause bursting. When fogging DO NOT place in small enclosed areas or restricted spaces such as cabinets, closets or under tables. Use only one can in rooms 12' x 12' or smaller.

Contains no CFCs or other ozone depleting substances. Federal regulations prohibit CFC propellants in aerosols.

SATISFACTION GUARANTEED:

IF RAID FOGGER K does not provide effective roach and flea control, call toll-free 800-558-5252 weekdays, 9:00 a.m. to 9:00 p.m. Eastern Time, to arrange for a full refund.

Questions? Comments? Call 800-558-5252 Weekdays 9-9 Eastern time or Write
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EPA Reg. No. 4822-452

EPA Est. No.

<Label on Individual Unit>

Raid Fogger K

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cyclopropanecarboxylate]..... 1.716%

INERT INGREDIENTS:..... 98.284%

NET WT. 1.5 (2.1) oz.

KEEP OUT OF REACH OF CHILDREN

CAUTION: See outer container for additional precautionary statements and complete
directions

Contains no CFCs or other ozone depleting substances. Federal regulations prohibit
CFC propellants in aerosols.

Questions? Comments? Call 800-558-5252 Weekdays 9-9 Eastern time or Write
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